

FILED

APR 10 2008

Katherine Williams
445 Fordham Cir
Vallejo, CA 94589-1867
(707) 643-2423

RICHARD W. WIE
CLERK, U.S. DISTRICT CL
NORTHERN DISTRICT OF CALIFORNIA

KATHERINE WILLIAMS
Plaintiff

CASE NO. C 08-00026 WHA

v.
JOHN E. POTTER, POSTMASTER GENERAL
Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION
Hearing Date April 10, 2008 11:00am**

**DISCOVERY
REQUEST FOR PRODUCTION
OF PERSONAL FILES ON ANY
AND COMPLAINTS WHICH ARE
IN PARTY'S POSSESSION,
CUSTODY, CONTROL OR
KNOWLEDGE**

- ✓ mean I request any and all information from you for discovery on individuals
- ❖ mean I already have information
- mean I want subpoenaed to be put under oath or that you subpoena information

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REQUESTING RECORDS/ COMPLAINTS ON THE FOLLOWING INDIVIDUALS IN
BOLD UNDERLINE OF ANY ASSAULTS, DISCRIMINATION, HARASSMENTS
OR UNFAIR TREATMENT AND INDIVIDUAL TO BE SUBPOENAED FOR
DEPOSITIONS

- ✓ **Mr. Aguilera, Rebecca Nehring, Darcie Kibodeaux, Margie Dusell, Larry Headington, Yolanda Mamsaang, Michael Catabay, Rhonda Esgana**
 - All names in bold put under oath to show contradiction in statement previously made to investigators.
- ✓ Time cards of Darcie Kibodeaux and Larry Headington from 3/18/06 – 6/9/06.
- ✓ Mr. Aguilera time cards from 6/15/06 – 7/1/06.
- ✓ Time cards of Katherine Williams from 3/17/06 – 6/8/06.
 - Time card of VR on June 8, 2006.
- ✓ I would like any and all complaints of current and former postal workers who have complained of discrimination, harassment/hostile working conditions, assaults, wrongful termination, poor working conditions i.e. singled out to receive different treatment, job made unfair, over burden by given more mail to case and deliver, witness to unprofessional employees or supervisor during their probation period.

➤ Larry Headington
➤ Yolanda Mamsaang
➤ Kathy Choisy
➤ Mr. Ed Kimble
➤ Rhonda Esgana

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- I request that you contact **Tina Bixby who is the Property Manager at Bridgeport Apt. 450 Pittman Rd. Fairfield, CA 94534 at phone (707) 863-9952 on the status of tenant Georgette F. AbouNader on when she moved from unit #423.** Darcie stated I discarded good mail. (fraud) **I can't get this information it must come from post office or by subpoena.**
- ✓ I would like information on the date when Phillip, Sam, Monet, Juan and Germil all delivered their route that was assign from personnel with no assistance.
 - VR witnessed me putting plastic trays I made behind the cage 2x's.
 - Mike Catabay witnessed Larry Headington put a sticky on my back and laughed at what it said.
 - ❖ Notice of Rating Eligible that shows that I originally selected Vallejo Post Office, not Fairfield. An Asian lady asked me to go to that area.
 - ❖ Statement that show how Rebecca Nehring did a shabby investigation putting confidence in Darcie Kibodeaux.
 - ❖ Statement that Darcie Kibodeaux sent to Rebecca Nehring lying that I never told her that I felt Larry Headington was hitting on me I told her over the phone in March 24, 2006.

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- ❖ Ruth Dushon told me when she started Larry Headington ask her if she wanted a chocolate kiss.
- Ruth Dushon on activities planned by Rhonda Esgana (party at her house).
- I would like Steve Tran to testify he also witnessed me making tray for route 19.

✓ Time cards of Yolanda Mamsaang from 6/06-present